

# JSM ELECTRONICS, INC.

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## Comments on Proposed Rule Making

### Comments on Dockets ET 00-258, IB 99-81, RM-9911, RM-9498, and RM-10024

JSM Electronics is a woman owned, small business based in Central Florida. Our primary business is providing communications equipment to service providers in the United States. JSM Electronics became aware of the UTStarcom Personal Access System through our relationship with the Advanced Rural Communications Consortium and we believe that this type of system is very well suited to the small community markets that we serve.

Our primary interest in this proceeding is with respect to the Unlicensed PCS Band between 1910MHz and 1920MHz. Many of our customers are small operators who could never afford to compete with the national wireless carriers to gain access to spectrum. We believe that our underserved communities will be best served by simply making changes to the technical rules for the unlicensed use of these frequencies to allow for deployment of globally standard low power systems instead of limiting use to systems that are highly customized to comply with the current US rules for that band. Allowing us to use standard technology in this unlicensed spectrum will give us the opportunity to source a wide variety of components around the world that we can use to assemble systems to provide local wireless service for people who otherwise could not afford the standard wireless packages offered by all the US cellular providers.

JSM Electronics believes that adopting rule changes proposed by UTStarcom to allow for the use of these standard protocols in the 1910MHz to 1920MHz band will result in very rapid deployment of local wireless systems to provide both fixed and mobile voice and data service to small town populations. Community Wireless systems already comply with FCC requests for location identification, number portability, and CALEA, and do so in a manner that does not require unrealistic and unattainable investments by our customers. Many of these functions are already available in the wire line switches operated by our existing and potential customers and adding the wireless access component to those systems will be very simple using this type of technology. On the question of introducing rule changes only in the 1920MHz to 1930MHz band, we believe that this may eventually lead to development of systems serving these markets, but we expect that this would take considerable time as electronic devices already

exist for operation up to 1920MHz. These components, many of which are Application Specific Integrated Circuits (ASICs), would require redesign to move into the higher band. This will result in considerable delays as well as in a high probability of increased cost for the equipment. As all of our operators are very cost sensitive, since they cannot simply pass added expenses on to their customers, we believe that allowing us to use existing standard components is in both our interest as well as in the interest of US consumers.

With respect to the question of changing the rules to only allow Community Wireless operation on the frequencies between 1915MHz and 1920MHz, leaving 1910MHz to 1915MHz as half of a new, high power traditional PCS Cellular license, JSM believes that we could deploy systems to provide just voice service on 5MHz but more spectrum is required for a combination of voice and data. The 10MHz between 1910MHz and 1920MHz, or even the 8MHz available after leaving 1918Mhz to 1920MHz for only the current UPCS voice systems, would be sufficient to allow our customers to offer both voice and mobile data in their markets.

JSM Electronics believes that the Commission should immediately adopt the rule changes to allow for the operation of Community Wireless networks, based on globally standard technology, in the Unlicensed PCS Band between 1910MHz and 1920MHz.

Sincerely,

Joseph Norelli